

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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In re: Daniel Jay Cho

Case No.: 24-25518

Debtor.

Chapter 13

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**OBJECTION TO MOTION FOR RELIEF FROM STAY BY JESSICA LEE**

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NOW COMES the Debtor(s), by and through their attorney, Brent J. Berning, and objects to the Motion for Relief from the Automatic Stay filed by Jessica Lee ("Movant"). In support thereof, Debtor(s) state as follows:

1. The Debtor and counsel were under the impression that Krekeler Law, LLC was going to file an objection to the underlying motion for relief.
2. Based upon a review of the motion, (1) the continuation of the non-bankruptcy action would prejudice the debtor, (2) the debtor denies that the hardship would outweigh for the non-bankruptcy and (3) there is no basis that the creditor is likely to prevail.

WHEREFORE, the Debtor respectfully requests that this Court deny the Motion for Relief from the Automatic Stay, allow counsel and debtor further time to review options and set an evidentiary hearing on the matter.

Dated at Milwaukee, Wisconsin this 18th day of June 2025.

/ s / Brent J. Berning

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Brent J. Berning  
Berning Law, LLC

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CERTIFICATE OF SERVICE

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On June 12, 2025, I, Brent Berning, served a copy of the Objection on the following persons in the following manner:

1. Deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, to the parties:

Daniel Jay Cho  
2202 S. Kinnickinnic Avenue, Unit 506  
Milwaukee, WI 53207

Respectfully submitted,

/ s / Brent J. Berning

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Brent J. Berning  
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